

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**CARMEN OTERO Mc CULLOCH,**

Plaintiff,

-against-

**07 CV 9780 (LAP) (RLE)**

**TOWN OF MILAN, TOWN OF MILAN TOWN BOARD,  
JOHN V. TALMADGE, Town Supervisor, and ALFRED  
LO BRUTTON, PAULINE COMBE-CLARK, DIANE  
MAY, and ROSS WILLIAMS, Councilpersons, TOWN OF  
MILAN PLANNING BOARD, LAUREN KINGMAN,  
Chairman, and Members JEFFREY ANAGOS, PETER  
GROSS, SHEILA MARGIOTTA, MARY ANN  
HOFFMAN, and PAULINE COMBE-CLARK, GARY  
E. BECK, Zoning Enforcement Officer, Town of Milan, and  
FRANK MARGIOTTA, BARBARA HUGHEY, and  
CHARLOTTE NORMAN,**

Defendants.

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**DEFENDANTS' REPLY MEMORANDUM OF LAW IN  
SUPPORT OF MOTION TO DISMISS AMENDED COMPLAINT**

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**TABLE OF CONTENTS****POINT I**

<b>PLAINTIFF'S CLAIMS ARE NOT RIPE</b>	1
--	---

**POINT II**

<b>CHALLENGE TO SUBDIVISION CONDITIONS BARRED BY STATUTE OF LIMITATIONS</b>	3
---	---

**POINT III**

<b>FAIR HOUSING ACT CLAIMS BARRED BY STATUTE OF LIMITATIONS</b>	5
---	---

**POINT IV**

<b>THE COMPLAINT FAILS TO STATE A CAUSE OF ACTION PURSUANT TO THE FAIR HOUSING ACT</b>	8
--	---

**POINT V**

<b>PLAINTIFFS LACK A PROPERTY INTEREST</b>	11
--	----

**POINT VI**

<b>CONSULTANT FEES PROPER</b>	12
-------------------------------	----

**POINT VII**

<b>PLAINTIFF DOES NOT POSSESSES A SUBSTANTIVE DUE PROCESS CLAIM</b>	15
---	----

**POINT VIII**

<b>THE COMPLAINT FAILS TO STATE A PROCEDURAL DUE PROCESS CLAIM</b>	16
--	----

**POINT IX**

<b>NO TAKING CLAIM EXISTS AS A MATTER OF LAW</b>	16
--	----

**POINT X**

**CLAIMS AGAINST INDIVIDUAL DEFENDANTS  
BARRED BY *KNORR-PENNINGTON* DOCTRINE**

17

**POINT XI**

**FAILURE TO ALLEGE FILING OF PROPER NOTICE  
OF CLAIM BARS CLAIM PURSUANT TO  
NEW YORK STATE CONSTITUTION, STATE LAW**

17

**POINT XII**

**PUNITIVE DAMAGES NOT RECOVERABLE  
AGAINST MUNICIPAL CORPORATIONS/OFFICIALS**

18

**POINT XIII**

**DECLARATORY RELIEF BARRED**

18

**CONCLUSION**

19

## TABLE OF CITATIONS

### Federal Decisions

<p><i>Assisted Living Associates of Moorestown LLC v. Moorestown Township</i>, 996 F.Supp. 409 (D.N.J. 1998)</p> <p><i>Bailey v. New York City Transit Authority</i>, 1994 WL 376046 (S.D.N.Y. 1993)</p> <p><i>Bailey v. Tricolla</i>, 1995 WL 548714 (E.D.N.Y. 1995)</p> <p><i>Bell Atlantic Corp. v. Twombly</i>, 127 S. Ct. 1955 (2007)</p> <p><i>Blankman v. County of Nassau</i>, 819 F.Supp. 198 (E.D.N.Y. 1993), <i>aff'd</i>, 14 F.3d 592 (2d Cir. 1993)</p> <p><i>Blesedell v. Mobil Oil Co.</i>, 708 F.Supp. 1408 (S.D.N.Y. 1989)</p> <p><i>Bryant Woods Inn, Inc. v. Howard County</i>, 124 F.3d 597 (4<sup>th</sup> Cir. 1997)</p> <p><i>Chardon v. Fernandez</i>, 454 U.S. 6 (1981)</p> <p><i>Cole v. Housing Authority of the City of Newport</i>, 435 F.2d 807 (1<sup>st</sup> Cir. 1970)</p> <p><i>Covington v. City of New York</i>, 916 F.Supp. 282 (S.D.N.Y. 1996)</p> <p><i>Day v. Moscow</i>, 769 F.Supp. 472 (S.D.N.Y. 1991), <i>aff'd</i>, 955 F.2d 807 (2d Cir.), <i>cert. denied</i>, 506 U.S. 821 (1992)</p> <p><i>Findlay v. Reynolds Metal Co., Inc.</i>, 82 F.Supp.2d 27 (N.D.N.Y. 2000)</p> <p><i>Gleason v. McBride</i>, 715 F.Supp. 59 (S.D.N.Y. 1988), <i>modified on other grounds</i>, 869 F.2d 688 (2d Cir. 1989)</p> <p><i>Greenbrair, Ltd. v. City of Alabaster</i>, 881 F.2d 1570 (11<sup>th</sup> Cir. 1989)</p> <p><i>Groome Resources Ltd, LLC v. Parish of Jefferson</i>, 234 F.3d 192 (5<sup>th</sup> Cir. 2000)</p> <p><i>Havens Realty Corp. v. Coleman</i>, 455 U.S. 363 (1982)</p> <p><i>Howard v. Town of Bethel</i>, 481 F.Supp.2d 295 (S.D.N.Y. 2007)</p> <p><i>Ishikawa v. New York Dept. of Cultural Affairs</i>, 1993 WL 362393 (S.D.N.Y. 1993)</p>	<p>1</p> <p>5</p> <p>5</p> <p>8</p> <p>6, 7</p> <p>6</p> <p>1</p> <p>5</p> <p>7, 9</p> <p>5</p> <p>6</p> <p>5</p> <p>7</p> <p>2</p> <p>1</p> <p>7</p> <p>14</p> <p>5</p>
---	--

<i>King v. New Rochelle Municipal Housing Authority</i> , 442 F.2d 646 (2d Cir.), <i>cert. denied</i> , 404 U.S. 863 (1971)	9
<i>Kittay v. Giuliani</i> , 112 F.Supp.2d 342 (S.D.N.Y. 2000), <i>aff'd</i> , 252 F.3d 645 (2d Cir. 2001)	2
<i>LaBeach v. Nestle Co.</i> , 658 F.Supp. 676 (S.D.N.Y.1987)	5
<i>Lee v. Town Board of the Town of Ellicott</i> , 151 Fed.Appx. 18 (2d Cir. 2005)	7
<i>Marathon Outdoor, LLC v. Vesconti</i> , 107 F.Supp.2d 355 (S.D.N.Y. 2000)	2
<i>Martin v. Nannie and the Newborns, Inc.</i> , 3 F.3d 1410 (3d Cir. 1993)	6
<i>National Railroad Passenger Corp. v. Morgan</i> , 536 U.S. 101 (2002)	7
<i>Patsy v. Florida Board of Regents</i> , 457 U.S. 496 (1982)	2
<i>Rassam v. San Juan College Board</i> , 113 F.3d 1247, 1997 WL 253048 (10 <sup>th</sup> Cir. 1997)	6
<i>Shapiro v. Thompson</i> , 394 U.S. 618 (1969)	9
<i>Singleton v. City of New York</i> , 632 F.2d 185 (2d Cir. 1980), <i>cert. denied</i> , 450 U.S 920 (1981)	7
<i>Tari v. Collier County</i> , 56 F.3d 1533 (11 <sup>th</sup> Cir. 1995)	2
<i>Town of Southold v. Town of East Hampton</i> , 406 F.Supp.2d 227 (E.D.N.Y. 2005), <i>affirmed in part, vacated in part</i> , 477 F.3d 38 (2d Cir. 2007)	5-6
<i>Weissman v. Fruchtman</i> , 700 F.Supp. 746 (S.D.N.Y. 1988)	2
<i>Williamson County Regional Planning Commission v. Hamilton Bank</i> , 473 U.S. 172 (1985)	2
<u>New York State Decisions</u>	
<i>Allen v. Town of North Hempstead</i> , 121 Misc.2d 795, 469 N.Y.S.2d 795 (Sup. Ct. Nassau Co. 1983), <i>aff'd</i> , 103 A.D.2d 144, 478 N.Y.S.2d 919 (2d Dept. 1984)	9
<i>Berenson v. Town of New Castle</i> , 28 N.Y.2d 102, 378 N.Y.S.2d 672, 341 N.E.2d 236 (1975)	9-10, 10 n. 3

<i>Casolaro v. Zoning Board of Appeals of the Village of Elmsford</i> , 200 A.D.2d 742, 607 N.Y.S.2d 79 (2d Dept. 1994)	4
<i>Coates v. Planning Board of the Village of Bayville</i> , 58 N.Y.2d 800, 459 N.Y.S.2d 259, 260, 445 N.E.2d 642 (1983)	14
<i>Home Builders Association of Central New York v. Town of Onondaga</i> , 267 A.D.2d 973, 701 N.Y.S.2d 542 (4 <sup>th</sup> Dept. 1999)	12, 13
<i>Jewish Reconstructionist Synagogue of N. Shore v. Village of Roslyn Harbor</i> , 40 N.Y.2d 158, 386 N.Y.S.2d 198, 352 N.E.2d 115 (1976)	14
<i>Kennedy v. Zoning Board of Appeals of the Village of Croton-on-Hudson</i> , 78 N.Y.2d 1083, 578 N.Y.S.2d 120, 585 N.E.2d 369 (1991)	4
<i>Mc Cartney v. Village of East Williston</i> , 149 A.D.2d 597, 540 N.Y.S.2d 456 (2d Dept. 1989)	4 n. 2
<i>Open Space Council v. Planning Board of the Town of Brookhaven</i> , 152 A.D.2d 698, 543 N.Y.S.2d 754 (2d Dept. 1989)	3
<i>Pickett v. Town of Tusten Zoning Board of Appeals</i> , 169 A.D.2d 906, 564 N.Y.S.2d 625 (3d Dept. 1991)	4
<i>Properties of New York, Inc. v. Planning Board of the Town of Stuyvesant</i> , 35 A.D.3d 941, 825 N.Y.S.2d 575 (3d Dept. 2006)	12
<i>Twin Lakes Development Corp. v. Town of Monroe</i> , 1 N.Y.3d 98, 769 N.Y.S.2d 445, 801 N.E.2d 821 (2003)	14
<i>Wildlife Associates v. Town Board of the Town of Southampton</i> , 141 A.D.2d 651, 529 N.Y.S.2d 548 (2d Dept. 1988)	14
<u>New York State Administrative Decisions</u>	
90 Op.Cptr. 14, 1990 WL 507605 (1990)	14
<u>New York State Statutes</u>	
General Municipal Law § 50-e	15 n. 6
Town Law § 118	14
Town Law § 119	14